28

1

2

3

4

5

6

7

8

9

JAMES P. KEMP, ESQUIRE		
Nevada Bar No. 006375		
KEMP & KEMP, ATTORNEYS AT LAW		
7435 W. Azure Drive, Suite 110,		
Las Vegas, NV 89130		
(702) 258-1183 tel./(702) 258-6983 fax		
jp@kemp-attorneys.com		
Attorney for Plaintiff Reginald Sullivan		

UNITED STATES DISTRICT COURT DISTRICT OF NEVADA

REGINALD SULLIVAN,

Plaintiff,

VS.

CLARK COUNTY, a political subdivision of the State of Nevada; JOHN MARTIN in his official and/or individual capacities; PATRICK SCHREIBER in his official and/or individual capacities,

Defendants.

CASE NO. 2:18-cv-00825-GMN-DJA

STIPULATION AND ORDER TO END TIME FOR PLAINTIFF TO RESPOND TO DEFENDANTS' MOTION FOR SUMMARY JUDGMENT

(Third Request)

The parties, by and through their respective counsel, hereby stipulate to extend the time for Plaintiff to respond to the Defendant's Motion for Summary Judgment (ECF No. 35) from the current due date of Wednesday, May 20, 2020 through and including Monday, June 1, 2020.

This is the third request for an extension of this deadline. The parties provide the following information to the Court regarding the proposed extension of time:

- 1. Plaintiff's counsel's office experienced a computer and IT catastrophe and meltdown on Tuesday, May 12, 2020 wherein his server became disabled and his email communications system failed.
- 2. Plaintiff's counsel has spent most of the past week working with his IT contractor to order new computers, establish work-around methods to re-

Case 2:18-cv-00825-GMN-DJA Document 44 Filed 05/20/20 Page 2 of 2

	1	establish the email system (which took three full days) and working with		
	2	software vendors and the copier/scanning company to make arrangements for other case management and document production processes to be ready		
	3			
	4	to go when the new computers are installed over Memorial Day weekend.		
	5	3. This final one-week extension should be the last barring any other unforeseen disasters.		
	6			
	7	This stipulation to extend the deadline is made in good faith and not for purposes of delay.		
	8	This stipulation to extend the deadline is made in g	good faith and not for purposes of delay.	
	9	DATED this _19 th _ day of May, 2020.	DATED this _19 th _ day of May, 2020.	
	10	KEMP & KEMP, ATTORNEYS AT LAW	LEWIS BRISBOIS BISGAARD & SMITH LL	
	12			
83	13	By: /s/ James P. Kemp JAMES P. KEMP, ESQ.	By: /s/ Robert W. Freeman ROBERT W. FREEMAN, ESQ.	
W. W. te 110 89130	14	Nevada Bar No. 6375 7435 W. Azure Drive, Suite 110	Nevada Bar No. 003062 6385 S. Rainbow Boulevard, Suite 600	
EMP & KEMP TTORNEYS AT LAW W. Azure Drive, Suite 110 VEGAS, NEVADA 89130 258-1183 + Fax (702) 258-6983	15	Las Vegas, Nevada 89130	Las Vegas, Nevada 89118	
KEMP & ATTORNEY: 5 W. Azure D S VEGAS, NI 2) 258-1183 +	16	Attorneys for Plaintiff	Attorneys for Defendants	
KE] ATT 7435 W. LAS VE (702) 258	17	<u>ORDER</u>		
Tel.	18	IT IS SO ORDERED.		
	19	Dated this 20 day of May, 2020.		
	20	,,,,,,,		
	21		Weil	
	22		oria M. Navarro, District Judge	
	23	UN	NITED STATES DISTRICT COURT	
	24			
	25			
	26			
	27			